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June 23, 2022

VIA ECF

Hon. Colleen McMahon  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2550  
New York, New York 10007

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Re: *EscapeX IP LLC v. Digital Trends*, Case No. 1:22-cv-03512-CM  
Agreed Letter Motion To Extend Deadline to Respond to First Amended Complaint

Your Honor:

I represent defendant Digital Trends in the captioned patent infringement litigation.

Defendant's deadline to move, answer, or otherwise respond to the First Amended Complaint in this matter is currently June 27, 2022. *See* D.I. 10; F.R.C.P. 15.

Defendant hereby moves under Local Rules 5.2(b) and 7.1(d) and the Court's Individual Practice V.H to extend that response deadline to August 11, 2022. Plaintiff consents to this request.

Pursuant to the Court's Individual Practice I.D, Defendant states that this is the first request to extend the initial answer deadline, that no scheduling order has yet been entered in this case, and that no scheduled deadlines (including the Court's Initial Pretrial Conference scheduled for September 8, 2022) will be affected by this request.

Respectfully submitted,

/s/ Matthew J. Moffa

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